



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SDD  
F.#2012R01574

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 5, 2015

**By Hand and ECF**

Honorable John Gleeson  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Ahmed, et al.  
Criminal Docket No. 12-661 (S-2) (JG)

Dear Judge Gleeson:

To the extent it now appears likely that this Court will need to rule on pending objections to various portions of deposition testimony taken pursuant to Rule 15 of the Federal Rules of Criminal Procedure in the above-referenced case, the government writes to apprise the Court that on Friday, May 1, 2015, the parties provided electronic copies of the deposition transcripts to Judge Townes' Courtroom Deputy and a law clerk assigned to the case. In addition, the government intends to provide color hard copies to the Court this afternoon, as well as unedited electronic copies and links to the audio-video recordings of the depositions to aid the Court in ruling on the pending objections.

Consistent with prior practice before this Court, the deposition transcript markups indicate objections and limited arguments from all parties. While they are a joint submission, they do not reflect agreement among the parties (in almost all instances) to the proposed objections. The foundation and relevance of the government's elicitation of co-conspirator statements during the depositions is set forth in the government's recently filed motions in limine (ECF#287), which may prove helpful in ruling on the objections.

Please also note that our videographer has requested two weeks to edit the videos once the rulings are complete. Accordingly, in order to have the videos trial-ready by May 26 (the current trial date), we would ideally have final rulings on the objections by May

